



CERTIFIED MAIL

7008 1140 0001 3318 9639

March 27th, 2015

Attn: Evelyn Rosborough
United States Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

**Re: Golden Pass LNG Terminal LLC
NPDES Permit No. TX0125067
Renewal Draft Permit Comments**

Dear Ms. Rosborough,

Golden Pass LNG (GPLNG) has reviewed the copy of the proposed National Pollution Discharge Elimination System (NPDES) permit received from the EPA on March 5th, 2015. As part of the process for finalizing the draft permit, GPLNG submits the following comments and clarifications identified as potential issues in the permit fact sheet and draft permit.

The submitted information format will be a numerical list of fact sheet or draft permit sections immediately followed by bulleted GPLNG comment or clarification:

1. Permit fact sheet and draft permit, various sections: The phrase "*portable* water" appears throughout the fact sheet and draft permit.

- GPLNG believes this to be a simple typo meant to be "*potable* water" referring to the city water that GPLNG receives and redistributes to the facility personnel. (Also, please see #2 for related comment). Please change "portable" to "potable" in all cases.

2. Fact Sheet pg. 6-7 (Section C.4.) Fact sheet states, "*EPA is not concerned with the metals present in the city water. Sample of the portable [sic] water must be taken for the analysis (results may be obtained from the portable [sic] water supplier); the results will be evaluated for RP to determine whether or not there is a limit.*"

- GPLNG would like to clarify that the "potable water" is in fact City of Port Arthur supplied water. When GPLNG refers to Terminal potable water and the Terminal potable water system, we are referring to city water that is received by the terminal and distributed to the terminal personnel. There are no treatments to the city/potable water after it is received from the City.

- GPLNG intends to supply the metal analysis results to the EPA from the potable water supplier (Port Arthur) as requested. If some or all required metal analysis results are unavailable from the supplier, GPLNG intends to have a contracted laboratory obtain results by sampling the potable water from the release point of one of our automatic potable water flushing devices before the potable water contacts the ground and before reaching any of the sumps. Metals analysis obtained from the City or from on-site city water sampling will not be representative of water discharged from our Outfalls as any city water which reaches the Outfalls would be highly diluted with storm water. In lieu of or in addition to sampling metals directly from city water, GPLNG requests to sample required metals from Outfall 002 and Outfall 003 sample points to obtain the most representative metals sample.

3. Permit pg. 2 of Part 1, Section 2. Outfalls 002 & 003 – Final Effluent Levels, Table for monitoring requirements and effluent limits lists “Flow” measurement frequency as *Daily* (when discharging).

- GPLNG understands there are other LNG facilities within the region which are only required to monitor and measure flow from stormwater outfalls weekly when discharging. GPLNG respectfully requests that the current monitoring frequency of “daily when discharging” be amended to “weekly when discharging” in order to align this monitoring obligation with the required weekly grab samples.

4. Draft permit, pg. 3 of Part I (Section A.4.): Permit states, “*Sampling locations: right after Outfall 002 and right before Outfall 003 (at collection sump).*”

- Outfall 002 sampling point is located before Outfall 002 discharge point. Outfall 002 sample point is located in a safe and accessible location in the outfall piping system after which there is no flow from any sources into the piping system prior to Outfall 002 discharge point. See Attachment A “Golden Pass LNG – Stormwater Diagram” for a diagram of the sumps and their relation to Outfall 002 sample and discharge point.

5. Permit pg. 3 of Part 1, Section C. first bullet states, “....*No additional copies are needed if reporting electronically, however when submitting paper for EPA No. 3320-1, the permittee shall submit the original DMR signed and certified as required by Part III.D.11 and all other reports required by Part III.D. to the EPA and other agencies as required.*”

Last bullet states, “*All reports **shall** be sent to both EPA and the Texas Railroad Commission at the addresses shown in Part III of the permit.*”

- The first bullet in this section refers to submitting DMRs electronically using NetDMR and that it is not necessary to submit additional copies of the report if in this manner, then states that paper copies should be copied to the “other agencies” (TRRC). If GPLNG does in fact utilize the NetDMR system GPLNG would like confirmation that the first bullet supersedes the last and that we do not need to also submit the information to the TRRC when utilizing the NetDMR system.

Please contact Steven Andrews at (409) 971-4205 if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in dark ink, appearing to read "Randy Chisam". The signature is fluid and cursive, with the first name "Randy" and last name "Chisam" clearly distinguishable.

Randy Chisam
Vice President - Operations
Golden Pass LNG Terminal LLC

Attachment A: Golden Pass LNG – Stormwater Diagram



Sabine-Neches Waterway

Terminal
Ship Slip

Outfall 002
Sample Point

Storm-
water
Ret.
Pond

Tank 1

Tank 2

3 pumps (manual pumps)

LNG Containment Sump

3 pumps (manual pumps)

Tank 5

Tank 4

Tank 3

East Area
Stormwater
Containment
Sump

3 pumps (manual pumps)

Stormwater
Retention
Pond

LNG Containment Sump

2 pumps (manual pumps)

Process Area
Stormwater Sump

2 pumps (manual pumps)

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